

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

ZOHAR III, CORP.,<sup>1</sup>

Case No. 18-10512 (KBO)

Debtor.

DAVID DUNN, as Litigation Trustee for  
Zohar Litigation Trust-A;

Adv. Pro. No. 20-50534 (KBO)

Plaintiff,

-against-

PATRIARCH PARTNERS, LLC;  
PATRIARCH PARTNERS VIII, LLC;  
PATRIARCH PARTNERS XIV, LLC;  
PATRIARCH PARTNERS XV, LLC;  
PHOENIX VIII, LLC; OCTALUNA LLC;  
OCTALUNA II LLC; OCTALUNA III LLC;  
ARK II CLO 2001-1, LIMITED; ARK  
INVESTMENT PARTNERS II, LP; ARK  
ANGELS VIII, LLC; PATRIARCH  
PARTNERS MANAGEMENT GROUP, LLC;  
PATRIARCH PARTNERS AGENCY  
SERVICES, LLC; and LYNN TILTON,

Defendants, and

<sup>1</sup> The Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number, is Zohar III, Corp, (9612). The Debtors' address is c/o Province, LLC 70 Canal Street, Suite 12E, Stamford, CT 06902. In addition to Zohar III, Corp., the Debtor's affiliates include the following debtors whose bankruptcy cases have been closed prior to the date hereof, along with the last four digits of their respective federal tax identification numbers and chapter 11 case numbers: Zohar II 2005-1, Corp. (4059) (Case No. 18-10513); Zohar CDO 2003-1, Corp. (3724) (Case No. 18-10514); Zohar III, Limited (9261) (Case No. 18-10515); Zohar II 2005-1, Limited (8297) (Case No. 18-10516); Zohar CDO 2003-1, Limited (5119) and (Case No. 18-10517). All motions, contested matters, and adversary proceedings that remained open as of the closing of such cases, or that are opened after the date thereof, with respect to such Closed-Case debtors, are administered in this remaining chapter 11 case..

180S, INC.; BLACK MOUNTAIN DOORS, LLC; CROSCILL HOME, LLC; DURO TEXTILES, LLC; GLOBAL AUTOMOTIVE SYSTEMS, LLC; HERITAGE AVIATION, LTD.; INTREPID U.S.A., INC.; IMG HOLDINGS, INC.; JEWEL OF JANE, LLC; MOBILE ARMORED VEHICLES, LLC; SCAN-OPTICS, LLC; SILVERACK, LLC; STILA STYLES, LLC; SNELLING STAFFING, LLC; VULCAN ENGINEERING, INC; and XPIENT SOLUTIONS, LLC,

Nominal Defendants.

PATRIARCH PARTNERS VIII, LLC; PATRIARCH PARTNERS XIV, LLC; PATRIARCH PARTNERS XV, LLC; OCTALUNA LLC; OCTALUNA II LLC; OCTALUNA III LLC; PATRIARCH PARTNERS AGENCY SERVICES, LLC; and PATRIARCH PARTNERS, LLC,

Counterclaim and  
Third-Party  
Claimants,

-against-

ZOHAR CDO 2003-1, LIMITED; ZOHAR CDO 2003-1, CORP.; ZOHAR II 2005-1, LIMITED; ZOHAR II 2005-1, CORP.; ZOHAR III, LIMITED; ZOHAR III, CORP.,

Counterclaim and  
Third-Party  
Defendants.

ZOHAR LITIGATION TRUST-A,

Plaintiff,

-against-

Adv. Pro. No. 20-50776 (KBO)

LYNN TILTON, PATRIARCH  
PARTNERS, LLC, PATRIARCH  
PARTNERS VIII, LLC, PATRIARCH  
PARTNERS XIV, LLC, PATRIARCH  
PARTNERS XV, LLC PATRIARCH  
PARTNERS AGENCY SERVICES, LLC,  
PATRIARCH PARTNERS  
MANAGEMENT GROUP, LLC,  
OCTALUNA, LLC, OCTALUNA II, LLC,  
ARK II CLO 2001-1, LLC, ARK  
INVESTMENT PARTNERS II, L.P., LD  
INVESTMENTS, LLC, ZOHAR HOLDING,  
LLC, AND ZOHAR HOLDINGS, LLC,

Defendants.

**CERTIFICATE OF SERVICE**

I, Chad Corazza, hereby certify that on September 9, 2022, I caused a copy of the foregoing document, *Plaintiff's Unopposed Motion to Consolidate Actions* [Adv. Case No. 20-50534 Docket No. 221] and *Unopposed Motion to Substitute Plaintiff* [Adv. Case No. 20-50776 Docket No. 111], to be served upon the below parties in the manner indicated below:

Norman L. Pernick  
Patrick J. Reilley  
G. David Dean  
Cole Schotz P.C.  
500 Delaware Avenue, Suite 1410  
Wilmington, DE 19801  
[npernick@coleschotz.com](mailto:npernick@coleschotz.com)  
[preilley@coleschotz.com](mailto:preilley@coleschotz.com)  
[ddean@coleschotz.com](mailto:ddean@coleschotz.com)  
(Defendants)  
**Email**

Theresa Trzaskoma, Esq.  
Michael Tremonte, Esq.  
Vikram Shah, Esq.  
Sher Tremonte LLP  
90 Broad Street, 23rd Floor  
New York, NY 10004  
[ttrzaskoma@shertremonte.com](mailto:ttrzaskoma@shertremonte.com)  
[mtremonte@shertremonte.com](mailto:mtremonte@shertremonte.com)  
[vshah@shertremonte.com](mailto:vshah@shertremonte.com)  
(Defendants)  
**Email**

Laura Davis Jones, Esq.  
Timothy P. Cairns, Esq.  
Pachulski Stang Ziehl & Jones, LLP  
919 N. Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, DE 19899-87055  
[ljones@pszjlaw.com](mailto:ljones@pszjlaw.com)  
[tcairns@pszjlaw.com](mailto:tcairns@pszjlaw.com)  
(MBIA Insurance Company)  
***Email***

Gregory M. Petrick, Esq.  
Jonathan M. Hoff, Esq.  
Ingrid Bagby, Esq.  
Michele C. Maman, Esq.  
Cadwalader, Wickersham & Taft LLP  
200 Liberty Street  
New York, NY 10281  
[gregory.petrick@cwt.com](mailto:gregory.petrick@cwt.com)  
[jonathan.hoff@cwt.com](mailto:jonathan.hoff@cwt.com)  
[ingrid.bagby@cwt.com](mailto:ingrid.bagby@cwt.com)  
[michele.maman@cwt.com](mailto:michele.maman@cwt.com)  
(MBIA Insurance Company)  
***Email***

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Chad Corazza  
Chad Corazza, Paralegal  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253